

FILED

MAR 19 2025

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
TOLEDO

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BLAKE UNDERWOOD,

Defendant.

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) INFORMATION  
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CASE NO. **3:25 CR 122**  
Title 18, United States Code, Section 1343

**JUDGE ZOUHARY**

COUNT 1

(Wire Fraud, 18 U.S.C. § 1343)

The United States Attorney charges:

1. From on or about December of 2019, until on or about April of 2023, in the Northern District of Ohio, Western Division, Defendant BLAKE UNDERWOOD, devised and intended to devise a scheme or artifice to defraud Nemsys, Inc., by means of false and fraudulent pretenses, representations, promises, and material omissions, and for the purpose of executing the scheme and artifice to defraud and attempting to do so, transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, and pictures, in violation of Title 18, United States Code, Section 1343.

FORFEITURE

The United States Attorney further charges:

2. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), the allegation in Count 1 is incorporated herein by reference. As a result of the foregoing offense, Defendant BLAKE

UNDERWOOD shall forfeit to the United States any and all property constituting, or derived from, any proceeds traceable to such violation.

**SUBSTITUTE PROPERTY**

In the event that any property subject to forfeiture under 18 U.S.C. 981(a)(1)(C) and 28 U.S.C. § 2461(c), as a result of any act or omission of the defendant(s):

- a.) cannot be located upon exercise of due diligence;
- b.) has been transferred or sold to, or deposited with a third party;
- c.) has been placed beyond the jurisdiction of this Court;
- d.) has been substantially diminished in value; or,
- e.) has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) [as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c)], to seek forfeiture of any other property of the defendant(s), up to an amount equivalent to the value of the forfeitable property described above.

CAROL M. SKUTNIK  
Acting United States Attorney

By:



Ava R. Dustin  
Toledo Branch Chief